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U.S. DISTRICT COURT
DISTRICT OF MASS.*
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JUE ZHANG,)	
Plaintiff,)	
v.)	C.A. NO. 04-12735PBS
MICHAEL P. GOLDFINGER, M.D., and)	
SHRAGA N. GOLDBERG, M.D.,)	
Defendants.)	
)	

REQUEST FOR TRIBUNAL BY THE DEFENDANT,
SHRAGA N. GOLDBERG, M.D.,
PURSUANT TO M.G.L., CHAPTER 231, §60B

The defendant, Shraga N. Goldberg, M.D., hereby moves this Honorable Court to convene a Medical Malpractice Tribunal pursuant to M.G.L., Chapter 231, Section 60B, and states in support of this Motion the following:

1. This is an action that includes allegations of malpractice, mistake or error against a provider of health care;
2. The Complaint includes allegations of negligence;
3. The defendant is entitled by statute to a Tribunal hearing on the allegations that relate to its actions as a health care provider;
4. The defendant is a provider of medical and health care services to patients as defined in M.G.L. c. 231, § 60B;
5. The defendant is a radiologist;
6. Therefore, a board-certified radiologist is requested by the defendant to serve as the medical member of the Tribunal; and
7. The defendant Shraga Goldberg, M.D. is located in Suffolk County.

For the Defendant,
Shraga N. Goldberg, M.D.,
By his attorneys,

Sidney W. Adler, BBO #012660
Jennifer Boyd Herlihy, BBO #636815
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CERTIFICATE OF SERVICE
I hereby certify that a true copy of the foregoing
document was served on the parties named
on February 2, 2005.